

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

IN RE:	§	CASE NO. 15-70126-M-7
	§	
JAVIER AND IMELDA SALINAS	§	
DEBTOR(S)	§	CHAPTER 7

DEBTORS' MOTION TO CONVERT TO CHAPTER 13

RULE 9013 NOTICE

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING, UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW, JAVIER AND IMELDA SALINAS, Debtors, through the undersigned and request the Court to enter an Order converting this case to a case under Chapter 13 in conformity with 11 U.S.C. § 706(a). In support of the motion the following is stated:

1. On March 10, 2015, the Debtors filed a voluntary petition under Chapter 7 of the Bankruptcy Code, in the McAllen Division for the Southern District of Texas, which is administered as Case Number 15-70126-M-7.

2. Debtors now desire to convert their Chapter 7 case to a Chapter 13 and respectfully request this Court to grant their Motion.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that this Court will allow their Motion to Convert to Chapter 13 from a Chapter 7.

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Respectfully submitted,
MALAISE LAW FIRM

BY: /s/ Eduardo V. Rodriguez

Eduardo V. Rodriguez
Federal Id. No.: 19945
State Bar No. 00795621
1265 North Expressway 83
Brownsville, Texas 78520
Phone: (956) 547-9638
Fax: (956) 547-9630

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served on the date that it was filed electronically. Service was accomplished by regular First Class U.S. mail, unless otherwise requested by electronic mailing, to the following:

Trustee:

Cindy Boudloche, Chapter 13 Trustee
555 N. Carancahua, Suite 600
Corpus Christi, Texas 78478

U.S. Trustee
606 N. Carancahua, Suite 1107
Corpus Christi, TX 78401

DEBTOR(S):

Javier and Imelda Salinas
2212 N. Coyote Ave.
San Juana, TX 78589

and to all creditors as specified on the attached Service List.

/s/Eduardo V. Rodriguez

Eduardo V. Rodriguez

Debtor(s): **Javier Salinas**
Imelda C. Salinas

Case No: **15-70126-M-13**
 Chapter: **13**

SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

ACE Cash Express
 2901 N. 10th
 McAllen, TX 78504
 Bad Address

Credit Central
 200 North McColl Rd.
 McAllen, TX 78501

Onemain Financial
 Po Box 183172
 Columbus, OH 73218-3172

Alamo American Finance
 417 S. Broadway
 McAllen, TX 78501

Credit Collection
 c/o Quest Diagnostics
 Two Wells Avenue
 Newton, MA 02459

Onemain Financial
 Po Box 499
 Hanover, MD 21076
 Bad Address

AT&T
 P.O. Box 5001
 Carol Stream, IL 60197-5001

Debt Recovery Solution
 Attention: Bankruptcy
 900 Merchants Concourse Ste LL1
 Westbury, NY 11590

Pay Pal Credit
 P.O. Box 105658
 Atlanta, GA 30348-5658

Avant Credit Corporation
 640 N Lasalle St
 Chicago, IL 60654

Gatestone
 1000 N. West Street, Suite 1200
 Wilmington, DE 19801

Pay Pal Extras
 P.O. Box 960080
 Orlando, FL 32896-0080

Azteca Loan Company
 905 W. FM 495
 San Juan, TX 78589

GEGRB/Gap
 Attn: Bankruptcy
 PO Box 103104
 Roswell, GA 30076

Quest Diagnostics
 P.O. Box 740779
 Cincinnati, OH 5274-0779

Best Buy/CBNA
 701 East 60th Street
 Sioux Falls, SD 57104

GEGRB/GE Money Sport
 Attn: Bankruptcy
 PO Box 103104
 Roswell, GA 30076

Regional Finance
 901 N. Raul Longoria Rd., Ste.
 San Juan, TX 78589

Capital One, N.a.
 Capital One Bank (USA) N.A.
 PO Box 30285
 Salt Lake City, UT 84130

Grace Launder
 1004 N. 3rd Street
 McAllen, TX 78504

Security Finance
 225 S. Cage, Suite C
 Pharr, TX 78577

Commonwealth Financial
 245 Main St
 Dickson City, PA 18519

Linebarger Goggan Blair & Samps
 c/o Diane W. Sanders
 P.O. Box 17428
 Austin, TX 78760-7428

Security Service Federal Credit
 16211 La Cantera Parkway
 San Antonio, TX 78256-2419

Conns Credit Corp
 Box 2358
 Beaumont, TX 77704

Malaise Law Firm
 1265 N. Expressway 83
 Brownsville, TX 78520

Springleaf Financial S
 5209 N Mccoll Rd
 Mcallen, TX 78504

Covington Credit
 1618 N. Veterans Blvd.
 San Juan, TX 78589

Navy Army Community Cu
 Po Box 81349
 Corpus Christi, TX 78468

Sun Loan #76
 126 E Park Ave Ste A
 Pharr, TX 78577

Debtor(s): **Javier Salinas**
Imelda C. Salinas

Case No: **15-70126-M-13**
Chapter: **13**

SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

Synchrony Bank
c/o Recovery Management System
25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Texan Credit
1449 W. Duranta, Ste. 2C
Alamo, TX 78516

Webbank/gettington
6250 Ridgewood Rd
Saint Cloud, MN 56303